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Raymond R. Garon
Vice President/General Manager

OFFICE OF THE CHAIRMAN

April 12, 1999

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MAY 20 1999

The Honorable William Kennard
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Dear Mr. Chairman:

As a life long broadcaster, I write to you to express my fear concerning your proposal to augment diversity in radio by licensing low power FM's.

I can most effectively demonstrate my point by asking you to imagine for a moment the effect that would transpire if a governmental body forced up to 40% more homes into the neighborhood in which you live. Think about that. Through a grand plan of eminent domain, your neighborhood would be jammed with a multitude of new homes. Land boundaries would be ignored, stable homesteads would be disrupted, and commonplace services would be overburdened.

Mr. Chairman, because your proposal is physically impossible to achieve without rampant political dominance, it is critical that you consider the ramifications were you allowed to add these many more signals to the already crowded FM band.

First, the livelihood of thousands of local broadcasters would be seriously threatened including those of women, and minority owners. Microradio would create a level of interference to existing FM stations never before experienced, cutting directly into the gut of any radio stations' "reason to be".

Second, this havoc would spell administrative doom in the FCC. It is clearly difficult regulating the present number of stations. Imagine thousands more!

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Third, because the present environment is extremely competitive, special interest groups would find it difficult, if not impossible, to prosper. Unfortunately, many operators now have trouble staying solvent.

Fourth, the markets where diversity is most needed would remain under-served because no allocations are close to available in those larger metropolitan areas.

Fifth, the millions of dollars in community service now provided by local broadcasters will be abated. In order to offer the public service organizations the benefit of free support, a station must have a solid business foundation. That strength would be absolutely impeded by adding so many more players to the field, especially players who themselves will not be financially capable of fully serving their communities.

Sixth, Digital Broadcasting technology, which is about to flourish, will be set back by years. They have built their systems based on current day second and third adjacency protection standards.

Please stop this proposal immediately. I implore you to find places for diverse voices within the current radio landscape. There are plenty of operators with the room for different voices. Research the Internet; see what's ahead with DAB. We are living in a wonderful time for communications and there are numerous ways for special interest groups to be heard, but the FM band is NOT in any way prepared for the chaos that will be generated by Microradio. Neither is the FCC.

Very truly yours,

Raymond R. Garon
VP/GM, Saga Communications of New England,
Chair, New Hampshire Association of Broadcasters

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